REMARKS

In the Office Action Mailed May 19, 2005, the Examiner rejected claims 1-6, 8-10, 12-16, 18-40, 42, 44-46 and 48 under 35 U.S.C. § 102(e) and the Examiner rejected claims 7, 11, 17, 41, 43 and 47 under 35 U.S.C. § 103(a). Claim 1, 29, 36 and 45 are independent.

Applicants have amended claim 1 to incorporate the subject matter of dependent claim 23, and claim 29 to incorporate the subject matter of dependent claim 35. As such, claims 23 and 35 have been canceled. Further, Applicants has added new claims 49-52. After careful review of the pending claims and the cited references, Applicants respectively request favorable reconsideration in view of the following remarks.

Response to the 35 U.S.C. § 102(e) Claim Rejections

Claims 1-6, 8-10, 12-16, 18-40, 42, 44-46 and 48 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,430,624 (Jamtgaard). To anticipate a claim, each and every element set forth in the claim must be found in a single reference. (MPEP § 2131). Further, "[t]he identical invention must be shown in as complete detail as contained in the ... claims." (MPEP § 2131). Applicants submit that Jamtgaard does not teach all elements of each of claims 1, 7, 14 and 20 in as complete detail as contained in these claims.

As per claims 1-17, 19-22, 24-34 and 45-48, for example, Applicants submit that Jamtgaard does not teach a system for accessing information content comprising a server browser, client browser, and a serializer for dynamically formatting accessed information content, "wherein the server browser and the client browser distribute a set of tasks to format the information content so that both the client browser and the server browser format portions of the information content for display on the client browser," and "wherein the server browser determines which tasks are performed by the client browser, and wherein the server browser

performs more formatting tasks than the client browser thereby <u>accelerating delivery of the</u> <u>information content to the client browser</u>," as in claim 1 and similarly in claims 29 and 45. For example, in the exemplary embodiment, the server browser and the client browser work together to access the information content by separating functionality between the browsers. (Specification, p. 4, lines 14-16). In this way, content can be transferred to the client browser in an accelerated manner in order to optimize the speed of transferring the formatted content to the client browser.

Jamtgaard teaches a translation system that allows content providers to deliver content in different formats to one or more different information appliances without needing to reformat, re-author or rebuild an existing web site. (Col. 4, lines 44-50). The system includes an appliance connection handler, a connection handler (which mimics a standard HTML browser and functions as the interface with a content provider's web site), an XML engine and a layout engine. (Col. 7, line 30 to Col. 8, line 25).

Jamtgaard teaches that an information appliance requests Web page information of a particular URL website from a content provider. The request is redirected to the translation system. The appliance connection handler examines header information from the requesting data to determine a target device, protocol and browser configuration. The appliance connection handler then requests the desired URL information from the content connection handler. The content connection handler retrieves the requested information from a content provider and returns the requested information as XHTML data to the appliance connection handler. The appliance connection handler then requests the XML engine to convert the received XHTML data to a proprietary markup language, RML (Relational Markup Language) so that presentation cards can be created and placed in a presentation shoe to transmit the cards to the target device.

The application connection handler then conveys the RML data output from the XML engine to the layout engine, which generates a device and protocol specific set of data. Formatted output provided by the layout engine is referred to as a "presentation shoe." The presentation shoe is formatted specifically for the target appliance's screen size, user interface and protocol and is served to the requesting appliance by the appliance connection handler. (Col. 8, lines 5-65).

Jamtgaard does not teach "wherein the server browser and the client browser distribute a set of tasks to format the information content so that both the client browser and the server browser format portions of the information content for display on the client browser," as in claim 1 and similarly in claims 29 and 45. In contrast, Jamtgaard teaches that all of the formatting of information occurs at the translation system, and then the formatted information is served to the requesting device. Thus, Jamtgaard also does not teach "wherein the server browser determines which tasks are performed by the client browser, and wherein the server browser performs more formatting tasks than the client browser thereby accelerating delivery of the information content to the client browser," as in claim 1 and similarly in claims 29 and 45.

The Examiner asserted that Jamtgaard "discloses that the server browser and the client browser distribute a set of tasks to access the information content, and wherein the server browser performs more tasks than the client browser (col. 4, lines 58-66; server browser can perform tasks of retrieving data from data provider and passing the data on to be translated into compatible formats of the client device)." (Office Action, p. 7, paragraph 4). Applicants respectfully disagree. The section cited by the Examiner explains that the translation server takes information directly from an Internet content provider's web site and then re-delivers it to information appliances in a format that is completely customized to the end user's device type and browsing capabilities. Thus, this section explains that it is the server browser that performs

all of the formatting of information in order to deliver format to a device that is already "completely customized to the end user's device type and browsing capabilities." Jamtgaard does not teach that the client browser performs any formatting of requested information.

As per claims 36-42, Applicants submit that Jamtgaard does not teach a system for accessing information content including "an event translator for encoding user event instructions within markup language of the information content," and "wherein the event translator translates the request into an event recognizable by the server browser by decoding the request to identify a user event," as in claim 36.

Jamtgaard teaches the appliance connection handler, which operates as a Web server for the requesting information appliance. The appliance connection handler brokers and controls the entire transaction between the requesting device and the translation server. (Col. 7, lines 30-47). As discussed above, Jamtgaard teaches that the appliance connection handler receives the request from the requesting device and then requests the desired URL information from the content connection handler. No encoding/decoding of the request occurs. The content connection handler simply retrieves the requested information from the content provider and returns it as XHTML data to the appliance connection handler. (Col. 8, lines 25-46).

Jamtgaard does not teach an event translator for including "an event translator for encoding user event instructions within markup of the information content," and "wherein the event translator translates the request into an event recognizable by the server browser by decoding the request to identify a user event," as in claim 36. Jamtgaard does not discuss this aspect of the claimed invention. Within Jamtgaard, the apparatus that communicates between the server browser and the client browser (i.e., application connection handler) does not encode/decode user events within markup of the information content.

Response to the 35 U.S.C. § 103(a) Claim Rejections

To establish a *prima facie* case of obviousness under §103 the cited references must teach or suggest all the claim limitations. (MPEP § 2142).

Claim 7 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Jamtgaard in view of U.S. Patent No. 6,836,792 (Chen). Claims 17, 41 and 43 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Jamtgaard in view of U.S. Patent No. 6,300,947 (Kanevsky). Claims 11 and 47 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Jamtgaard in view of U.S. Patent No. 6,343,274 (McCollom). Claims 7, 11, 17, 41, 43 and 47 are each dependent from one of claims 1, 29, 36 and 45. Applicants submit that neither Chen, Kanevsky, nor McCollom make up for the shortcomings of Jamtgaard, as discussed above. As such, the cited combinations of references do not obviate any of the present claims.
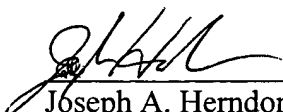
CONCLUSION

In light of the above amendments and remarks, Applicants submit that the present application is in condition for allowance and respectfully request notice to that effect. The Examiner is respectfully requested to contact Applicants' representative below at (312) 913-3331 if any questions arise or if he may be of assistance to the Examiner.

McDonnell Boehnen Hulbert and Berghoff LLP
Respectfully Submitted,

Date: 11/21/05

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